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Attorneys for Defendant
BASS & ASSOCIATES, P.C.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MICHAEL GREGORY,

Plaintiff,

v.

BASS & ASSOCIATES, P.C..

Defendant.

CASE NO.: 2:19-cv-02101-KJD-BNW

**STIPULATION AND (PROPOSED)
ORDER REGARDING EXTENSION OF
TIME FOR RESPONSE BY DEFENDANT
TO THE COMPLAINT**

SECOND REQUEST FOR EXTENSION

Plaintiff Michael Gregory (“Plaintiff”) and Defendant Bass & Associates, P.C., (“Defendant”) (collectively referred to as the “Parties”), through counsel and subject to this Court’s approval, hereby stipulate and agree as follows:

WHEREAS, Plaintiff filed its Complaint in the above-captioned action on December 9, 2019;

WHEREAS, Defendant is currently scheduled to answer or otherwise respond to the Complaint by January 2, 2020 2020 (as a result of an earlier Stipulation [DE #4] and Order [DE #5];

WHEREAS, Plaintiff and Defendant are actively exploring the possibility of an early resolution of this matter through negotiations and request additional time for Defendant to respond to the Complaint, with an extension of time through and including February 24, 2020.

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1 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
2 Parties, through their undersigned counsel, as follows:

- 3 1. Defendant shall answer or file a motion to dismiss the Complaint by February
4 24, 2020.

6 DATED: January 23, 2020

DATED: January 23, 2020

7 LAW OFFICE OF HAYES & WELSH

HAINES & KRIEGER, LLC

8 /s/ Martin L. Welsh
9 MARTIN L. WELSH, ESQ.
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11 Attorneys for Defendant
12 BASS & ASSOCIATES, P.C.

/s/ Shawn W. Miller
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Las Vegas, Nevada 89123
Attorneys for Plaintiff
MICHAEL GREGORY

13 **IT IS SO ORDERED**

15 **DATED: January 24, 2020**

17 

18 **BRENDA WEKSLER**
19 **UNITED STATES MAGISTRATE JUDGE**

22 Submitted by:

23 /s/ Martin L. Welsh

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